

JOSHUA WARREN )  
)  
PLAINTIFF )  
)  
VS. )  
)  
MOUNT ETNA PARTNERS, LLC )  
)  
RONALD BLACKBURN )  
)  
GARRETT REINCKE )  
DEFENDANTS )

**MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

4. Under Fed. R. Civ. P. 55(a), the Clerk must enter the Defendant's default.

5. Pursuant to Fed. R. Civ. P. 55(b)(2), Plaintiff hereby moves this Court for entry of default judgment, and provide leave to the Plaintiff to provide an Affidavit and/or other evidence setting forth the dollar amount of his damages herein.

WHEREFORE, Plaintiff prays the Court enter default against Defendant Garrett Reincke, that Defendant be deemed to have admitted all allegations in the Complaint, that the Court enter a default judgment against Defendant, and for such other and further relief as this Court deems appropriate in the circumstances.

Respectfully submitted,

**BUCHANAN & WILLIAMS, P.C.**

// s // Andrew S. Buchanan

Andrew S. Buchanan, MO Bar #53824

James V. O'Brien, MO Bar #31161

1105 E 32<sup>nd</sup> St., Ste 5

Joplin, Missouri 64804

Telephone: 417-623-8220

Facsimile: 417-781-9706

E-Mail: [asbuchanan@bwoattorneys.com](mailto:asbuchanan@bwoattorneys.com)  
[jobrien@bwoattorneys.com](mailto:jobrien@bwoattorneys.com)

*Attorneys for Plaintiff*